

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

Division

FILED

2024 JUL 25 PM 2:41

U.S. DISTRICT COURT
MIDDLE DISTRICT OF TN

Mr. Jesse Daniel Roberts

Mrs. Tamara Lashae Roberts

Case No.

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

See Attached List

Jury Trial: (check one) ☒ Yes ☐ No

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS
(Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Address

County

Telephone Number

E-Mail Address

~~See Attachments~~ Jesse Daniel Roberts
Tangra Lashae Roberts
510 Country Wood Lane
Galax, TN 38562
City State Zip Code
Jackson - conduct occurred in Putnam Co.
(865) 315-2507
executive pawn 986-8676

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name

Job or Title (if known)

Address

City

State

Zip Code

County

Telephone Number

E-Mail Address (if known)

See Attachments

☐

Individual capacity

☐

Official capacity

Defendant No. 2

Name

Job or Title (if known)

Address

City

State

Zip Code

County

Telephone Number

E-Mail Address (if known)

☐

Individual capacity

☐

Official capacity

Defendant #1

Herbert H. Slatery III

Office of the Attorney General and Reporter

P.O. Box 20207 Nashville, TN 37202 ...

This defendant falls under the jurisdiction of the Middle District of Tennessee and was in office on December, year of our Lord 2017 when the illegal conspiracy begins.

The Civil Rights violations occurred in Putnam County Tennessee under the purview, policies, and leadership of this defendant. Whereas his policies, rules, and practices did in fact defraud the Federal Government of the United States Of America and The State of Tennessee of funds to facilitate a Federal Crime, The illegal kidnapping of Movant's six children T.K.R., R.L.R., A.L.S. T.S.R., T.D.R., and T.C.R. This defendant is the head of the State actors involved in this conspiracy that deprived Movant's their Fourth, Sixth, and, Fourteenth Amendment rights while acting under color of the law,

Defendant # 2

Johnathon Skrmetti

Office of the Attorney General and Reporter

P.O. Box 20207 Nashville, TN 37202

... This defendant falls under the jurisdiction of the Middle District of Tennessee and was in office on November 21, 2022, whereas under his leadership the illegal conspiracy continues.

The Civil Rights violations occurred in Putnam County Tennessee under the purview, policies, and leadership of this defendant. Whereas his policies, rules, and practices did in fact defraud the Federal Government of the United States of America and The State of Tennessee of funds to facilitate a Federal Crime, The illegal kidnapping of Movant's six children T.K.R., R.L.R., A.L.S. T.S.R., T.D.R., and T.C.R. This defendant is the head of the State actors involved in this conspiracy that deprived Movant's their Fourth, Sixth, and Fourteenth Amendment rights while acting under color of the law,

Defendant # 3

Bonnie Hommrich

DCS Commissioner #1

UBS Tower, 10th Floor
315 Deaderick Street
Nashville, TN 37238
(615) 741-9701

... This defendant falls under the jurisdiction of the Middle District of Tennessee and was in office on December, 2017, whereas under her leadership the Civil Rights violations and criminal conduct begins.

The Civil Rights violations occurred in Putnam County Tennessee under the purview, policies, and leadership of this defendant. Whereas his policies, rules, and practices did in fact defraud the Federal Government of the United States of America and The State of Tennessee of funds to facilitate a Federal Crime, The illegal kidnapping of Movant's six children T.K.R., R.L.R., A.L.S. T.S.R., T.D.R., and T.C.R. This defendant is the head of the State actors involved in this conspiracy that deprived Movant's their Fourth, Sixth, and Fourteenth Amendment rights while acting under color of the law, She served as the Commissioner from 2015 until her retirement in 2019 when her role as a co-conspirator ended.

Defendant # 4

Margie Quin

DCS Commissioner # 2

UBS Tower, 10th Floor
315 Deaderick Street
Nashville, TN 37238
(615) 741-9701

... This defendant falls under the jurisdiction of the Middle District of Tennessee and was in office on March 05, 2024, to date, whereas under her leadership the Civil Rights violations and criminal conspiracy continues. Under her direction three of Movants children are indeed kidnapped.

The Civil Rights violations occurred in Putnam County Tennessee under the purview, policies, and leadership of this defendant. Whereas his policies, rules, and practices did in fact defraud the Federal Government of the United States of America and The State of Tennessee of funds to facilitate a Federal Crime, The illegal kidnapping of Movant's six children T.K.R., R.L.R., A.L.S. T.S.R., T.D.R., and T.C.R. This defendant indeed one of the State actors involved in this conspiracy that deprived Movant's their Fourth, Sixth, and Fourteenth Amendment rights while acting under color of the law, She is currently serving where as of March 4, 2024 her role in this conspiracy continues.

Defendant # 5

Tracy Hetzel

Upper Cumberland Senior Associate Counsel

600 Hearthwood Ct

Cookeville, TN 38506

PH: 423-296-8997

... This defendant falls under the jurisdiction of the Middle District of Tennessee and was in office December 2017, whereas under her prosecution and her role as co-conspirator whereas the Civil Rights violations and criminal conspiracy continues.

The Civil Rights violations occurred in Putnam County Tennessee under the purview, prosecution and leadership of this defendant. Whereas her policies, rules, and practices, and prosecution did in fact defraud the Federal Government of the United States of America and The State of Tennessee of funds to facilitate a Federal Crime, The illegal kidnapping of Movant's six children T.K.R., R.L.R., A.L.S. T.S.R., T.D.R., and T.C.R. This defendant indeed is one of the State actors involved in this conspiracy that deprived Movant's their Fourth, Sixth, and Fourteenth Amendment rights while acting under color of the law,

Her role as a conspirator is very significant as she was the architect involved from the start whereas she puts the mother Tamara L. Stafford Robards under duress, promising not to prosecute for severe child abuse and neglect, and then makes promises that mother after signing away parental her rights to the state with regard to her first three children, (see attached history) will continue to visit as was her then normal routine. An illegal scheme hatched by Tracy Hatzel and mothers then Case Manager Dreama Neely. The result of this contract results in Mother being charged and convicted of severe child abuse and neglect, in addition mother has been barred for seeing those children since the day mother signed the papers in the judge's office, while under the influence of drugs, and whereas NO ATTORNEY for mother is listed on the record. She then continues her role as a ringleader working in concert with Cookeville Regional Medical Center, DCS/CPS, the Clerk of Court of Putnam County, Jennifer Wilkerson, Ann Auston attorney for the Moons, the foster Parents, the Putnam County Court, Judge Stephen Randolph, and Judge Caroline Knight to facilitate and continue this conspiracy and in fact carries out the illegal kidnapping of T.S.R. and T.D.R. Its is unclear due to the ongoing conspiracy if her conduct ends with child five, T.D.R., as Ivy Mayberry enters as prosecutor regarding child six, T.C.R.

Defendant # 6

Dreama Neely

Department of Childrens Services Case Manager

600 Heartwood Court

Cookeville, Tn 38506

PH: (931)646-3133

... This defendant falls under the jurisdiction of the Middle District of Tennessee and was in office December 2017, whereas under her prosecution and her role as co-conspirator whereas the Civil Rights violations and criminal conspiracy continues.

The Civil Rights violations occurred in Putnam County Tennessee under the purview, prosecution and leadership of this defendant. Whereas her policies, rules, and practices, and prosecution did in fact defraud the Federal Government of the United States of America and The State of Tennessee of funds to facilitate a Federal Crime, The illegal kidnapping of Movant's six children T.K.R., R.L.R., A.L.S. T.S.R., T.D.R., and T.C.R. This defendant indeed is one of the State actors involved in this conspiracy that deprived Movant's their Fourth, Sixth, and Fourteenth Amendment rights while acting under color of the law,

Her role as a conspirator is very significant as she was the architect involved from the start whereas she puts the mother Tamara L. Stafford Robards under duress, promising not to prosecute for severe child abuse and neglect, and then makes promises that mother, after signing away parental her rights to the state with regard to her first three children, (see attached history) will continue to visit as was her then normal routine. An illegal scheme hatched by Tracy Hatzel and mothers then Case Manager Dreama Neely. The result of this contract results in Mother being charged and convicted of severe child abuse and neglect, in addition mother has been barred for seeing those children since the day mother signed the papers in the judge's office, while under the influence of drugs, and whereas NO ATTORNEY for mother is listed on the record. She then continues her role as a ringleader working in concert with Cookeville Regional Medical Center, DCS/CPS, the Clerk of Court of Putnam County, Jennifer Wilkerson, Ann Auston attorney for the Moons, the foster Parents, the Putnam County Court, Judge Stephen Randolph, and Judge Caroline Knight to facilitate and continue this conspiracy and in fact carries out the illegal kidnapping of T.S.R. and T.D.R. Its is unclear due to the ongoing conspiracy if her conduct ends with child five, T.D.R., as Ivy Mayberry enters as prosecutor regarding child six, T.C.R.

Defendant # 7

Rebecca Medeiros

Department of Childrens Services/CPS

Case Worker

This defendant is one of CRMC's many conduits and was instrumental in the framework, whereas CRMC staff worked in concert to, according to the official hospital record, to falsify records that results the plot of, and the illegal kidnapping of child number four, T.S.R. This illegal act took place at CRMC, Cookeville TN at bedside, at the hospital and is plaintiff Jesse Daniel Robards first child with this mother. All the aforementioned Civil Rights violations are in play; thus Mr. Robards and his first child are entangled in this continuing conspiracy.

Defendant # 8

Tara Usery

Department of Childrens Services

Case Worker

This defendant after having and knowing for a fact that the Department of Childrens Services and CRMC, are working in concert, and that information was falsified to the Department continues to deprive both plaintiffs of their Constitutional Rights(4th,14th,right to family integrity, and familiar rights) thus, becoming a willing participant in this conspiracy that as for her role is still ongoing. Her as everyone the defendants listed, action were deliberate, and they violated these rights that are clearly established at the time of the offense.

Defendant # 8

Ivy Mayberry

Attorney for DCS

Under this defendant prosecution her actions pick up where Tracy Hatzels take leave. She is instrumental in this ongoing conspiracy to deprive defendants of all of the aforementioned rights. Moreover, she is the architect whereas acting under color of the law is the ringleader in the planning from December 15, 2024, where the illegal kidnapping of child six ensues. She instructs DCS to falsify and plant evidence on an 85-day old child to further the States legal position. This is truly the wild, wild, west of the legal world where anything goes. Just as of July 12, 2024 she also working in concert with Mrs. Ann Austin, and Judge Caroline Knight, where as they attempt to affect the outcome Movants ongoing case that is on appeal, whereas attorney Ann Auston is allowed to hand pick Movants Appellate attorney. Ann Auston being the Attorney for the Foster Parents, and as such Movants Mortal Legal Enemy. This not only unethical but is and bears direct conflict of interest and attaches to movants claim that their Sixth Amendment right are being violated.

Defendant # 9

Attorney E.J. Mackie

Mothers Attorney

This Defendant is guilty according the official record of continuing this conspiracy to deprive Mother Movant of her Constitutional rights whereas his conduct is of some of the most egregious in nature as he was charged with defending said rights. He is, as the official Court record states in direct collusion with the State and blatantly deprives mother of her Sixth

amendment right to competent counsel according to the Strickland test and as of his withdrawal from her cases on the last eight-hour hearing date, in open Court openly litigates for the State, not Mother Movant. This defendant is also a ring leader in this conspiracy!

Defendant # 10

Attorney Jamie Hargis

Fathers Attorney

27 N Main St, Sparta, TN 38583

(931) 256-8484

This defendant violates Movant father Sixth Amendment Rights by participating in this on-going conspiracy whereas he deprives the father of his rights to counsel after being duly appointed and chooses not to file an appeal on behalf of father after father insisted he do so. It appears via the record he trade his clients right for a more comfortable position as County Assistant public defender. When asked some months later why he did not file father appeal, he stated publicly, "he didn't think it was appropriate." This person willing participates IN THIS ON-GOING CONSPIRACY.

Defendant # 11

Attorney Randell Kirby

Fathers Attorney

219 Oakland Dr, Sparta, TN 38583

(931) 739-4224

This defendant violates Movant father Sixth Amendment Rights by participating in this on-going conspiracy whereas he deprives the father of his rights to counsel, this after being instructed by father to withdrawal shows up in court to posture as to represent UNBEKNOWST to the father. After withdrawing finally he not the court hand picks attorney Michael Stooksbury as fathers Appellate attorney, not the court. Attorney Stooksbury then, without so much as contacting the father, his new client, proceeds to file a brief on behalf of father with the Court of Appeals of Tennessee, UNBEKNOWEST to the father.

Defendant # 12

Attorney Michael Stooksbury

Appellate Attorney for Father

804 W Race St
Kingston, Tennessee 37763

865-830-6286

This defendant violates Movant father Sixth Amendment Rights by participating in this on-going conspiracy whereas he deprives the father of the aforementioned rights and is conspirator whereas he accepts appointment after he is aware of the conflict of interest where he is hand-picked by fathers past attorney, that father is obviously in conflict with, then Stooksbury files a brief that is void of claims father wishes to raise, all UNBEKNOWST to father. This defendant is in collusion with the State and Court of Putnam County to deprive Father of all of the aforementioned rights.

\

Defendant # 12

Judge Carline Knight

Putnam County Chancery Court Judge

PH: (931)526-6692

321 E .Spring Street, Suite 302

Cookeville, TN 38501

United States

This Judge clearly violates Movant 1st, 4th, 6th, and 14th Amendment right whereas she colludes with the Foster Parents Attorney Ann Austin to affect the outcome of Movant Mothers on-going cases. Her conduct is of the most egregious in nature as she is sworn to uphold the Constitution of the United States of America and The State of Tennessee.

Defendant # 13

Judge Stephen Randolph

Putnam County Juvenile Court Judge

R.

Steven

Randolph

9315285541

421 E. Spring St. Room 1C07

Cookeville, TN 38501

United States

This Judge clearly violates Movant 1st, 4th, 6th, and 14th Amendment right whereas she colludes with the State and deprive Movant's of all of the AFOREMENTION RIGHTS!

He blatantly deprives parents of Familiar right and family integrity right that are clearly established. After having in hand evidence of NO WRONGDOING on the part via the official he continues the conspiracy against the parents. As of July 23, 2024 upon motion to do he recused himself choosing once again to deprive the parents of all of the aforementioned rights, contained in Movants Motion To Set Aside and thus continues the on-going conspiracy whereas he is an active participant... See Attachments

Defendant # 14

Linsey Hodges

On-Site Drug Testing State Contractor

121 W Main St Ste 1, McMinnville, TN 37110 ·

(931) 473-1331

This defendant is a Major actor in this conspiracy whereas by and through the company she is employed by, without any doubt, acted illegally to, and in concert with the state, to deprive Movants of all of the aforementioned rights by falsifying evidence to the Court acting under the color of the law at the States behest. Under cross in open court, she verified this illegal act. Also part of the Court record. She a willing participant in this conspiracy.

Defendant # 15

Bryant C. Dunaway

13th Judicial Prosecutor

Upon written request to investigate the illegal kidnapping of Movants three children, Movant finally hears back from Mr. Dunnaway via phone call whereas he deprives Movant of the aforementioned rights, in addition to his refusal to in investigate these kidnappings. A violation of Movants clearly established Cilil Rights, Namely, parents 4th,6th, and 14th Amendment Rights.

Defendant #16

Sheriff Eddie Farris

Putnam County Sheriffs Office

421 E. Spring Street

Cookeville, Tn 38501

Upon request to investigate the illegal kidnapping of Movants three children, Movant finally speaks face to face with Mr. Farris as to how it can be anything but kidnapping whereas the State produces no evidence to obtain Movants last three children. Mr. Farris then agrees that that is in fact kidnapping and states in front of Chief Deputy Crabtree that he, Mr. Farris will contact Judge Steven Randolph and ask about opening an investigation, to no avail. Mr. Farris deprives Movant of the aforementioned rights, in addition to his refusal to in investigate these kidnappings. A violation of Movants clearly established Civil Rights, Namely, the parents 4th,6th, and 14th Amendment Rights, and thus plays an active role in this conspiracy by and through not acting.

Defendant # 17

Cookeville Regional Medical Center
One Medical Drive
Cookeville, Tn 38501

This defendant continues to be an active participant in this conspiracy by and through the conduct where as they are part of the system that defrauds the U.S. Government and State of Tn funds to facilitate the Kidnapping of T.S.R. where as to this day are will participants by refusing to release the name of the individuals that falsifies information to DCS on July 31, 2021. whereas the official Hospital record is absolutely VOID of said information. Movants believes this nurse to be one Kathleen Garrette, however can not be sure because Judge Steven Randolph works in concert with CRMC to obfuscate to truth by quashing Movants Official Subpoenas. Movants also Subpoenaed this information from CRMC on separate subpoena to no avail. Therefore, is easy to see that CRMC is indeed a continuing intricate part of this conspiracy and as such has no statue of limitation protections as a matter of law.

Movants humbly reserve the right under purview of the court to list more defendants going forward as parties to this suit as this conspiracy is continuing to this very day.

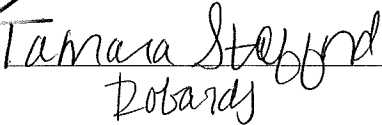
Movants are indigent and as such humbly ask this court for an immediate emergency injunction and safe return of T.S.R, T.D.R., and T.C.R. to parent custody.

Movant further ask this court to appoint appropriate counsel to assist Movant as they are not attorneys but find themselves proceeding Pro Se because they Have had NO other options, other than co-operate with a corrupt system seated in Putnam County or sign over custody of their children to the State, per every single court appointed, (out of Putnam County) attorney's advice to these parents.

Movant humbly prays for relief from this Federal Court



Mr. Jesse Daniel Robards



Mrs. Tamara Lashae Stafford Robards

Date 7-25-2024

Defendant No. 3

Name

Job or Title (if known)

Address

City

State

Zip Code

County

Telephone Number

E-Mail Address (if known)

☐ Individual capacity ☐ Official capacity

Defendant No. 4

Name

Job or Title (if known)

Address

City

State

Zip Code

County

Telephone Number

E-Mail Address (if known)

☐ Individual capacity ☐ Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

- ☐ Federal officials (a *Bivens* claim)
- ☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

1st, 4th, 6th, 14th Amendment U.S. Constitution

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

See Attachments

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

Putnam County, Knox County TN

- B. What date and approximate time did the events giving rise to your claim(s) occur?

Conspiracy Begins Dec. 2017

- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

See Attachments

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Punitive
Defamation of Character
Pain + Suffering
Loss Wages
Mental Anguish
Intentional Infliction
emotional distress
negligence
mal-practice

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

Emergency Immediate Injunctive relief
+ safe return of, TSR TOR & TLR
To parents v

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: _____

7-25-24

Signature of Plaintiff

Printed Name of Plaintiff

Tamara L. Roberts
Tamara L. Roberts

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address